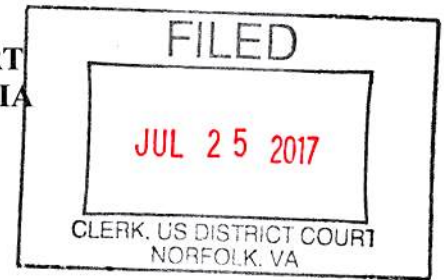


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division



SAIED EMAMI,

Plaintiff,

v.

ROBERT M. LIGHTFOOT, JR.,  
IN HIS OFFICIAL CAPACITY AS  
ADMINISTRATOR,  
NATIONAL AERONAUTICS AND  
SPACE ADMINISTRATION,

Defendant.

Civil Action No.: 2:15-cv-00034

**Plaintiff's Proposes the Court the Following Juror's Voir Dire  
Questionnaires (Employment Discrimination and Retaliation)**

In accords with April 10, 2017 Court Order, the following questionnaires are  
designed to assist the plaintiff in the jury selection process.

**Background Information**

1. Name: \_\_\_\_\_
2. Juror Number: \_\_\_\_\_
3. Gender: \_\_ Male \_\_ Female
4. Where were you born? \_\_\_\_\_
5. Age: \_\_\_\_\_
6. Where did you grow?
  - City: \_\_\_\_\_
  - State: \_\_\_\_\_
  - Other: \_\_\_\_\_

7. Current Address: \_\_\_\_\_

8. Do you own or rent your place of residence?

- \_\_\_ Own
- \_\_\_ Rent
- \_\_\_ Live with friends
- \_\_\_ Live with relatives

9. How long have you lived at your address? \_\_\_\_\_

If less than 10 years, where did you live before and why did you move?

\_\_\_\_\_

10. Please list all of the other people who live in your household and provide the following information:

Name	Age	Education	Occupation (if grown)	Employer

11. Please provide the same information for any children who do not live with you:

Name	Age	Education	Occupation (if grown)	Employer

12. If you have grandchildren, please provide the same information for them:

Name	Age	Education	Occupation (if grown)	Employer

13. Marital Status:

- ☐ Divorced/Remarried
- ☐ First Marriage
- ☐ Domestic Partner

- ☐ Divorced
- ☐ Widowed
- ☐ Never Married
- ☐ Separated

14. What is your racial/ethnic background?

- ☐ Caucasian
- ☐ African American
- ☐ Hispanic/Latino
- ☐ Asian/Pacific Islander
- ☐ Bi-racial or other

15. What is the highest grade you completed in school?

- ☐ Less than completion of high school
- ☐ Completed high school
- ☐ Technical or trade school
- ☐ Some college
- ☐ Junior college degree (Associate)
- ☐ College degree (Bachelor)
- ☐ Some graduate study
- ☐ Master or Doctorate

16. What is your current employment status?

- ☐ Employed full time
- ☐ Employed part time
- ☐ Self-employed

- ☐ Unemployed
- ☐ At home
- ☐ Full-time student
- ☐ Retired
- ☐ Other: \_\_\_\_\_

17. Current employer (or last employer if not currently employed):

- City and state: \_\_\_\_\_
- Type of business: \_\_\_\_\_
- Job or occupation: \_\_\_\_\_
- How long have you worked for this employer? \_\_\_\_\_

18. Previous employers/occupations

Previous Employer	State Date	End Date

19. Have you *ever* managed or supervised others as part of your job?

- ☐ Yes
- ☐ No

If yes, please explain:

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20. Have you, or has anyone close to you, ever been self-employed, a business owner, a corporate officer, or a member of the board of directors of any business or corporation?

• ☐ Yes

• ☐ No

If yes, please explain:

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21. Have you ever served in the military?

• ☐ Yes

• ☐ No

If yes, please fill out the below:

Branch of Service: \_\_\_\_\_

Dates of Service: \_\_\_\_\_

Type of discharge: \_\_\_\_\_

### **Your Spouse or Partner**

**Name:** \_\_\_\_\_

**Age:** \_\_\_\_\_

22. What is the highest grade your spouse/partner (former spouse) completed in school?

• ☐ Less than completion of high school

• ☐ Completed high school

• ☐ Technical or trade school

• ☐ Some college

- ☐ Junior college degree (Associate)
- ☐ College degree (Bachelor)
- ☐ Some graduate study
- ☐ Master or Doctorate

23. What is your spouse's/partner's (former spouse's) current employment status?

- ☐ Employed full time
- ☐ Employed part time
- ☐ Self-employed
- ☐ Unemployed
- ☐ At home
- ☐ Full-time student
- ☐ Retired
- ☐ Other: \_\_\_\_\_

24. Spouse's/partner's (former spouse's) current employer (or last employer if not currently employed):

- City and state: \_\_\_\_\_
- Type of business: \_\_\_\_\_
- Job or occupation: \_\_\_\_\_
- How long have you worked for this employer? \_\_\_\_\_
- Previous employers/occupations: \_\_\_\_\_

## **Organizations/Hobbies**

25. With which political party do you most identify with?

- ☐ Democrat
- ☐ Republican
- ☐ Independent
- ☐ Other: \_\_\_\_\_
- ☐ None

26. Do you belong to any civic, professional, fraternal, social, political or religious organizations?

- ☐ Yes
- ☐ No

If yes, please explain:

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27. Do you hold an office in any of the organizations?

- ☐ Yes
- ☐ No

If yes, please explain:

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28. List all community volunteer activities in which you participate:

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29. List all organizations to which you donate money:


30. What hobbies or recreational actives do you like to pursue in your spare time?


31. Do you or your spouse/significant other have bumper stickers on your car?

- ☐ Yes
- ☐ No

If yes, please explain:


## Sources of Information

32. What newspapers, magazines, radio station or online news services do you regularly read, listen to, or use?


33. How often do you view, read, or listen to the news?

- ☐ Every day
- ☐ Few times a week
- ☐ Occasionally
- ☐ Never

34. What newspapers do you read frequently?


35. What books, magazines and websites do you read for pleasure?



36. What books, magazines and websites do you read for information?


37. Have you ever written a letter to the editor of a newspaper or magazine or to a politician?

- ☐ Yes
- ☐ No

If yes, what was the letter about:


38. What, if any, television programs do you watch regularly? (e.g. CNN, MSNBC, FOX; also the shows from said channels such as: Global Public Square, Bill O'Riley, Shun Hanity, etc.)

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39. What, if any, courtroom or law-related shows do you watch?


40. What radio programs/stations do you listen to frequently?


41. What websites do you visit regularly?



42. How often do you visit social networking sites, such as Facebook, MySpace, Twitter, etc.?

- ☐ Every day
- ☐ Few times a week
- ☐ Occasionally
- ☐ Never

43. Do you have a blog or website?

- ☐ Yes
- ☐ No

If yes, please explain:

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44. Do you view or follow blogs of others regularly?

- ☐ Yes
- ☐ No

If yes, please indicate the blog(s) and topic(s):

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45. Do you visit chat rooms?

- ☐ Yes
- ☐ No

If yes, which one(s):

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46. Have you read, seen, or heard anything about this case?

- ☐ Yes
- ☐ No

If yes, what have read, seen or heard?

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**If yes, please indicate the specific source of your information (e.g. identify the specific television station/program you watched; magazine you read; person with whom you spoke, etc.)**

Television:		
Radio news:		
Radio talk shows:		
Newspapers:		
Magazines:		
Internet chat rooms:		
Conversations with others:		
Other:		

If yes, have you formed any preliminary opinions about this case?

- ☐ Yes
- ☐ No

If yes, please explain:

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47. The Judge will tell you to avoid all media coverage of the case for the duration of the trial. That means you are not allowed to read newspaper or magazines articles about the case, in print or online, or listen to the news related to the case on television, radio or the internet. Do you have any reservations about your ability or willingness to follow this instruction?

- ☐ Yes
- ☐ No

### **Case-Specific Questions**

48. Do you, or does someone close to you, have current or prior experience and/or training in any of the following?

- Psychology/counseling?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Social work/social services?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No

- Personnel/human resources?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Employee benefits?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Employee rules/manuals?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Law?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Legal field/law-related field?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Job laws?
  - ☐ Yes, me
  - ☐ Yes, someone close



- ☐ No
- Insurance/claims management?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Affirmative action/anti-discrimination programs?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Accounting/payroll?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Hearing officer/union steward?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Negotiator/arbitrator?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No

If yes, to any of the above, please explain:

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49. Have you, or has someone close to you ever:

- Been fired or laid off?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Been turned down for a job you/they wanted?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Worked in [the defendant's sector]?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Worked as a [plaintiff's position]?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
  - Owned a business/been self-employed? ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No

- Belonged to a union/workers' organization?

- ☐ Yes, me
- ☐ Yes, someone close
- ☐ No

- Felt discriminated against?

- ☐ Yes, me
- ☐ Yes, someone close
- ☐ No

- Been accused of discrimination?

- ☐ Yes, me
- ☐ Yes, someone close
- ☐ No

- Filed an internal grievance?

- ☐ Yes, me
- ☐ Yes, someone close
- ☐ No

- Filed a worker's comp claim?

- ☐ Yes, me
- ☐ Yes, someone close
- ☐ No

- Filed a grievance with a union?

- ☐ Yes, me
- ☐ Yes, someone close

- ☐ No
- Filed a charge with the EEOC/FEP?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No
- Been involved in an employment dispute?
  - ☐ Yes, me
  - ☐ Yes, someone close
  - ☐ No

If yes, to any of the above, please explain:

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50. Have you ever managed or supervised people as part of your job?

- ☐ Yes, me
- ☐ No

If yes, have you ever had to discipline or fire someone for any reason?

- ☐ Yes
- ☐ No

If yes, please explain:

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51. Do you have any opinions, attitudes or beliefs, either positive or negative, about the defendant's field and/or the defendant?

- ☐ Yes
- ☐ No

If yes, please explain:

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52. Have you, or has a family member or close friend, ever had a positive or negative experience with a [type of defendant-company in suit] and/or the defendant?

- ☐ Yes
- ☐ No

If yes, please explain:

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53. Have you, or has anyone close to you, ever been discriminated against or harassed in any way, for any reason, by another individual or business?

- ☐ Yes
- ☐ No

If yes, please explain:

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54. Have you, or has anyone close to you, ever been accused of discrimination or harassment or any type?

- ☐ Yes
- ☐ No

If yes, please explain:

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55. Has your employer ever been sued for discrimination or harassment?

- ☐ Yes
- ☐ No

If yes, please explain:

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56. If you own or ever have owned a business or been self-employed, were you ever sued for discrimination or harassment?

- ☐ Yes
- ☐ No

If yes, please explain:

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57. Do you agree or disagree with this statement: Discrimination/harassment claims are just excuses to cover up other problems people are having on the job?

- ☐ Agree
- ☐ Disagree

Why do you feel that way?

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58. Do you agree or disagree with this statement: Discrimination [harassment] is a thing of the past.

- ☐ Agree
- ☐ Disagree

Why do you feel that way?

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59. Have you, or has anyone close to you, ever been fired or laid off?

- ☐ Yes
- ☐ No

If yes, please explain:

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60. Have you, or anyone close to you, ever been turned down for a job you/they wanted or denied a promotion?

- ☐ Yes
- ☐ No

If yes, please explain:

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61. Have you, or anyone close to you, ever been a member of a class in a class-action suit?

- ☐ Yes
- ☐ No

If yes, please explain:

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**Legal Experience**



62. Have you, or anyone close to you, ever had any of the following experiences with the law?

- ☐ Training/education in law
- ☐ Employment in law
- ☐ Been sued
- ☐ Filed a lawsuit
- ☐ Decided not to file a lawsuit against someone whose conduct caused injury or damage
- ☐ Been served a court order
- ☐ Sought a court order (retraining order, stay-away order, injunction, etc.)
- ☐ Been a witness in a civil/criminal case
- ☐ Given a deposition
- ☐ Given a testimony to a grand jury
- ☐ Been arrested
- ☐ Been charged with a crime
- ☐ Been convicted of a crime
- ☐ Been a crime victim (assault, battery, robbery, murder, etc.)

If yes, please indicate who had this experience (you, or state the relationship of the person close to you) and describe that experience:

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63. Have you ever served on a jury?

- ☐ Yes

- ☐ No

If yes:

- In what court? (federal and/or state court): \_\_\_\_\_
- How many were criminal trials?: \_\_\_\_\_
- How many were civil trials?: \_\_\_\_\_

Did you serve as foreperson on any of these trials? Without indicating what the verdicts were, did all of the juries you served on reach a verdict?

- ☐ Yes
- ☐ No

How would you describe your past jury experience(s):

- ☐ Positive
- ☐ Neutral
- ☐ Negative

Why do you say that?

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64. Have you ever served on grand jury?

- ☐ Yes
- ☐ No

How would you describe your experience as a grand juror?

- ☐ Positive
- ☐ Neutral

- ☐ Negative

Why do you say that?

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65. Have you or anyone close to you ever worked for any of the following?:

- ☐ Law enforcement agency
- ☐ Corrections/detention system
- ☐ Court system
- ☐ Other law-related employer

If yes, please indicate who and describe:

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66. Are you currently or have you ever been a member of the Full Unformed Just Association (FIJA)?

- ☐ Yes
- ☐ No

### Current Jury Service

67. It is estimated that this trial will take  weeks. Do you have any difficulty being a juror in a case of this duration?

- ☐ Yes
- ☐ No

If yes, please explain:

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68. Are you taking any medications or do you have any physical or personal condition that would make it difficult for you to concentrate or attend al sessions during the trial?

- ☐ Yes
- ☐ No

If yes, please explain:

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69. Do you have any problem (vision, hearing, financial, emotional, language or medical) that you believe may significantly affect your jury service?

- ☐ Yes
- ☐ No

If yes, please explain:

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70. Do you have any moral, religious, or philosophical beliefs that would make it uncomfortable or difficult for you to judge another person?

- ☐ Yes

- ☐ No

If yes, please explain:

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71. Do you know any of the people in the list attached to this questionnaire?

- ☐ Yes
- ☐ No

If yes, please circle the names of the people you personally know.

Signed,  July 25, 2017  
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Saied Emami, Plaintiff (Pro se)      Date

103 Lakepoint Place

Yorktown, VA 23692

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing "Plaintiff's Proposes the Court the Following Juror's Voir Dire Questionnaires (Employment Discrimination and Retaliation)" was filed with the Court Clerk on July 25, 2017.

Further, I hereby certify that a true and accurate copy of foregoing document will mail to the following:

Virginia Van Valkenburg,  
Counsel for the Defendant  
Office of the US Attorney

101 West Main Street, Suite 8000  
Norfolk, Virginia 23510-

Signed,



July 25, 2017

Saied Emami, Plaintiff (Pro se)

Date

103 Lakepoint Place

Yorktown, VA 23692